



**SUNOCO PARTNERS  
MARKETING & TERMINALS**  
An ENERGY TRANSFER Partnership

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**CERTIFIED MAIL: 7006 0810 0002 4571 7505**

May 31, 2018

Ms. Heather Henry  
Air Quality Specialist  
Pennsylvania Department of Environmental Protection  
2 East Main Street  
Norristown, PA 19401

**RE: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook Industrial Complex  
Plan Approval 23-0119D  
Response to PADEP's "Startup Period" Interpretation**

Dear Ms. Henry:

Please accept this letter on behalf of Sunoco Partners Marketing & Terminals L.P. (SPMT) in response to the Pennsylvania Department of Environmental Protection's (PA DEP) facility audit which was conducted on May 23, 2018 relative to sources permitted and installed under Plan Approval 23-0119D.

Specifically, you raised a question with regard to Source ID: 103 NSPS Subpart VVa Fugitive Equipment Leaks, Condition #016 (a) [40 CFR 60.482-1a] and Condition #020 (a) (2) [40 CFR 60.482-7a (a) (2)] and the duration of time which may elapse prior to the first valve monitoring event. The conditions are as follows:

Condition #016 (a) [40 CFR 60.482-1a] states *"The permittee shall demonstrate compliance with the requirements of 40 CFR §§ 60.482-1a through 60.482-10a, as applicable, or 40 CFR § 60.480a (e) for all equipment within 180 days of initial startup."*

Condition #020 (a) (2) [40 CFR 60.482-7a (a) (2)] states *"The valve must be monitored for the first time within thirty (30) days after the end of its startup period to ensure proper installation. If the existing valves in the process unit are monitored in accordance with 40 CFR §§ 60.483-1a or 60.483-2a, count the new valve as leaking when calculating the percentage of valves leaking as described in 40 CFR § 60.483-2a(b)(5). If less than 2.0 percent of the valves are leaking for that process unit, the valve must be monitored for the first time during the next scheduled monitoring event for existing valves in the process unit or within 90 days, whichever comes first."*

There is a clear distinction between the two requirements. Condition #016 (a) [40 CFR 60.482-1a] is intended to address the group of all equipment within a process unit at new affected facility<sup>1</sup> and compliance must be demonstrated for this affected facility within 180 days of the initial startup<sup>2</sup> date. This allows facilities enough time to integrate all new equipment into a monitoring program.

<sup>1</sup> 40 CFR 60.480a(a)(2) states *"The group of all equipment (defined in §60.481a) within a process unit is an affected facility."*

<sup>2</sup> 40 CFR 60.2 defines startup as: *"Startup means the setting in operation of an affected facility for any purpose."*

Condition #020 (a) (2) [40 CFR 60.482-7a (a) (2)] is intended to address a new valve that comes into VOC service through a process expansion or replacement at an existing affected facility and compliance must be demonstrated for this valve within 30 days after the end of its startup period. The intent of this section is supported in the preamble of the Final Rule as published in the Federal Register, Vol. 72, No. 221 / Friday, November 16, 2007 in Section IV, Summary of Comments; B. Standards, 1. Initial Monitoring of Pumps and Valves.

As such, SPMT has completed initial monitoring within 180 days of startup of each respective phase of the project as they are commissioned. At this time, the only initial monitoring which has not been completed is related to the commissioning of the butane portion of the project. The butane system was commissioned on April 21, 2018, resulting in a compliance deadline on or before October 18, 2018. SPMT is currently in the process of tagging all components in preparation for monitoring.

Should you have any questions or comments regarding this submission, please do not hesitate to contact me at 610-859-1279.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Smith', with a stylized flourish at the end.

Kevin Smith  
Specialist – Environmental Compliance